

PAUL REYNOLDS CONSULTANT

415 North College Street

Greenville, AL 36037

September 7, 1993

(205) 382-8048 Fax 382-2940

RECEIVED

SEP 9 1993

FCC - MAIL ROOM

Mr. William F. Caton,
Acting Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RE: Dawson Broadcasting Company; Petition for Rule Making

Dear Mr. Caton:

Enclosed please find the original and four copies of a petition for rule making that we wish to file for the Court Appointer Receivers in the Dawson Broadcasting Company proceedings. Previously the petition was not possible. However, recently Day Communications, Inc., licensee of WQHL(FM), Live Oak, Florida, filed a form 302 seeking a downgrade. After this action WAZE can upgrade on channel 251C3, after channel 236A is substituted for channel 252A at Cordele, Georgia. Channel 290A must also be substituted for channel 236A at the CP site of WLML(FM), Montezuma, Georgia.

There is no filing fee that has to be paid at this time. Therefore a form 155 is not included.

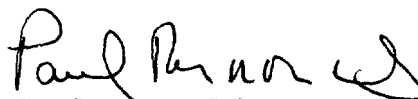
Please have someone in your office forward these petitions to:

Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Additionally, there is a copy included and labeled "Receipt Stamp Copy." Please have someone receipt stamp this document and return it to the petitioners in the attached addressed envelope.

Thank you for your assistance in getting this petition filed.

Sincerely,



Paul Reynolds,
Consultant

Enclosure(s)

BROADCAST CONSULTING AND CONSTRUCTION

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

SEP 9 1993

FCC - MAIL ROOM

In The Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Dawson, Cordele &
Montezuma, GA)

)
)
) MM Docket No. _____
)
) RM No. _____
)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING
and
REQUEST FOR ORDER TO SHOW CAUSE

John F. Tuck and Phonso Donaldson, Bankruptcy Court appointed Receivers for Dawson Broadcasting Company (DBC), hereby make request to the Commission to issue a Notice of Proposed Rule Making relating to WAZE(FM), Dawson, GA. DBC is licensee of WAZE(FM) and WHIA-AM, Dawson. The present Petition for Rule Making seeks the upgrade of WAZE from channel 251A to channel 251C3. Channel 251A was substituted for channel 221A at Dawson recently in MM Docket 90-475 (DA 93-720).

074
MMB

BACKGROUND

In MM Docket 90-475, DBC sought to substitute channel 299A for channel 221A in order for WAZE to increase power from 3 KW to 6 KW. However, this was in conflict with another proposed rule making filed by Clyde and Connie Scott dba EME Communications (EME). EME sought the allocation of channel 299C3 to Sasser, Georgia, as that community's first local service. During the Comment Period (DA 90-1399), Broadcast Associates (BA), licensee of WESP(FM), Dothan, Alabama, filed a counterproposal that offered the substitution of channel 251C3 in lieu of channel 299C3 at Sasser and the substitution of channel 299A for channel 221A at Dawson.

BA offered this counterproposal in order to resolve a conflict in MM Docket 90-129. BA needed channel 221A, then in service at Dawson, as a substitute for the proposed channel 271A at Columbia, Alabama. The allocation of channel 271A at Columbia was preventing the upgrade of WESP on channel 273C3.

In order to allocate channel 251C3 to Sasser instead of the EME requested channel 299C3, channel 236A had to be substituted for channel 252A at the licensed site of WKKN(FM), Cordele, Georgia [then call sign - WFAV(FM)]. Likewise, channel 236A met the Commission's minimum distance separation requirements only after channel 290A was

substituted for channel 236A at Montezuma, Georgia.

Subsequent to a Report and Order in MM Docket 90-475, the Commission allowed the upgrade of WQHL(FM) on channel 251C1 at Live Oak, Florida. The allocation of channel 251C3 at Sasser was in conflict with this allocation, however, the BA counterproposal was not made a party to the Live Oak proceeding.

The Final Report and Order (R&O) of MM Docket 90-475 (DA 93-720) granted channel 299C3 to Sasser and channel 251A to Dawson as a substitution for channel 221A. This satisfied the request of BA whose main goal was the use of channel 221A at Columbia. The R&O acknowledged the BA counterproposal, but stated it was accepting an agreement between the Dawson and Sasser petitioners for the allocation of channel 251A at Dawson, although it required an antenna/tower site change. The Court appointed Receivers nor other Dawson parties in the proceeding were aware of an agreement between DBC and EME where DBC agreed to accept channel 251A. This agreement was obviously made before the original owners of DBC were placed in bankruptcy court. It is very likely that if the Receivers had been made aware of this agreement they would have objected.

However, rather than file a Petition for Reconsideration to the R&O in MM Docket 90-475, DBC chose to approach the need for a higher class FM at Dawson in another

manner. Recent actions by WQHL(FM), Live Oak now make it possible for channel 251C3 to be substituted for channel 251A at Dawson.

NEW DEVELOPMENTS

On August 3, 1993, Day Communications, Inc. (DCI), licensee of WQHL(FM) on channel 251 filed a Form 302 with the Commission to downgrade to channel 251C2 at their present site. See Commission File No. BMLH-930803KB. A copy of the DCI Form 302 is included as attachment A. When channel 251C1 is deleted at Live Oak and channel 236A is substituted for channel 252A at Cordele, channel 251C3 can be substituted for channel 251A at Dawson. DBC had to wait until DCI filed its form 302 before submitting this petition.

DBC PETITION SUMMARIZED

The DBC Petition for Rule Making can be SUMMARIZED as follows:

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Dawson	251A	251C3
Cordele	252A	236A
Montezuma	236A	290A

The granting of the DBC request will cause no interruption of service in Montezuma since WLML is presently a CP only and not in operation. Based on recent

conversations and filings by the licensee at Cordele, there is no objection to the DBC scenario and RCI will move expeditiously to change channels from 252A to 236A.

REIMBURSEMENT OF EXPENSES

DBC is aware of Commission policy regarding reimbursement of licensee's expense when forced to make changes associated with channel changes that allow upgrades and allocations. It appears that Radio Cordele, Inc. (RCI), the licensee of WKKN(FM), Cordele is also desiring to relocate from channel 252A to channel 236A. Therefore, it should be easy for DBC to negotiate a settlement with RCI.

The channel change in Montezuma (WLML on channel 236A to channel 290A) concerns a construction permit (CP) only. Presently the permittee, Macon County Broadcasting Company, has an application before the Commission for an extension of its CP. Therefore, it remains unclear if WLML will be constructed by the time final action is taken on the present petition.

It appears that the licensee of WKKN, Cordele and the WLML permittee are not legible to be reimbursed for channel change expenses. However, should the Commission decide that either (or both) must be reimbursed, DBC will agree to the reasonable reimbursement of their channel change expenses.

EXPRESSION OF INTEREST

DBC hereby expresses interest in the deletion of channel 251A and the subsequent allocation of channel 251C3 at Dawson. It also request the modification of the license of WAZE to reflect this change. If the Commission allocates channel 251C3 to Dawson, DBC will immediately file a form 301 as required and upon its approval, will construct a class C3 facility for WAZE and operate same.

VERIFICATION

We, John F. Tuck and Phonso Donaldson, Court appointed Receivers of Dawson Broadcasting Company, licensee of WAZE(FM), Dawson, Georgia, hereby, verify that the statements contained in this Petition for Rule Making are true and correct to best of our knowledge and belief. We represent that this petition is not filed for the purpose of impending, obstructing, or delaying determination on any other application or petition with which it may be in conflict.

CONCLUSION

The Court appointed Trustees of Dawson Broadcasting Company are hereby submitting a petition for rule making on behalf of WAZE(FM), Dawson, Georgia. They are requesting that channel 251C3 be substituted for channel 251A and the license of WAZE be modified accordingly. This allocation was recently made much easier by the voluntary downgrade of WQHL(FM), Live Oak, FL on channel 251C1 to channel 251C2 at its current site. This leaves only the substitution of channel 236A for channel 252A at Cordele, GA (License) and channel 290A for channel 236A at Montezuma (CP) before channel 251C3 can be allocated to Dawson in keeping with the Commission's minimum distance separation requirements.

Based on previous filings with the Commission, the licensee at Cordele, Radio Cordele, Inc., seems agreeable to this channel change and may not require a show cause order, however, no communications has taken place between the DBC and the permittee of WLML, Montezuma. This substitution may require a show cause order.

The granting of the DBC petition will give Dawson a wide area service which is desperately needed due to the rural nature of Terrell County. It will provide for maximum class A operation at the licensed site of WKKN(FM), Cordele and the CP site of WLML(FM), Montezuma.

Basically the DBC is achieving what the Broadcast Associates Counterproposal proposed in giving Sasser a wide area class C3 service (achieved in MM Docket 90-475); allowing WAZE to move to a wide area service class C3 (contained in this proposal); and, not diminishing the current service at Cordele or the proposed service at Montezuma. The DBC petition is in keeping with the Commission's policy of promoting the **MAXIMUM UTILIZATION OF THE SPECTRUM.**

Respectfully Submitted,
DAWSON BROADCASTING COMPANY

By: 

John F. Tuck
Trustee

By: 

Phonso Donaldson
Trustee

John F. Tuck, Receiver
Phonso Donaldson, Receiver
DAWSON BROADCASTING COMPANY
c/o Truitt Martin, Jr., Esq.
P.O. Box 683
Dawson, GA 31742

September 8th, 1993

Approved by OMB
3080-0506
Expires 1/31/94

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FCC 302-FM

ATTACHMENT A

FOR
FCC
USE
ONLY

APPLICATION FOR FM
BROADCAST STATION LICENSE

(Please read instructions before completing this form.)

FOR MASS MEDIA BUREAU USE ONLY

BMLH - 930803KA
FILE NO.

Section 1 - GENERAL INFORMATION

1. APPLICANT NAME Day Communications, Inc.		RECEIVED	
MAILING ADDRESS (Line 1) (Maximum 35 characters) WOHL AM/FM		AUG - 3 1993	
MAILING ADDRESS (Line 2) (if required) (Maximum 35 characters) P.O. Box 130		FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY	
CITY Live Oak	STATE OR COUNTRY (if foreign address) Florida	ZIP CODE 32060	
TELEPHONE NUMBER (include area code) (904) 362-1250	CALL LETTERS WOHL-FM	OTHER FCC IDENTIFIER (IF APPLICABLE)	
FOR MAILING THIS APPLICATION, SEE INSTRUCTIONS FOR SECTION 1			
2. A. Is a fee submitted with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
B. If No, select the appropriate box to indicate reason for fee exemption (see 47 C.F.R. Section 1.1112) or reason a fee is not applicable and go to Question 3.			
<input type="checkbox"/> Governmental Entity <input type="checkbox"/> Noncommercial educational licensee <input checked="" type="checkbox"/> Other (Please explain): <div style="padding-left: 40px;">Downgrade in channel with no other changes proposed - See Exhibit No. 1.</div>			
C. If Item 2.A. is Yes, provide the following information:			
Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number listed in Column (B).			
(A)	(B)	(C)	FOR FCC USE ONLY
(1) FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	
0 0 0 1	0 0 0 1	\$ ----	
To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.			
(A)	(B)	(C)	FOR FCC USE ONLY
(2)			
0 0 0 1	0 0 0 1	\$ ----	
ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (2), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.		TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY
		\$ ----	

SECTION II - TECHNICAL DATA

1. Select one for each item. This application is for a:

- (a) ☐ Request for program test authority ☒ Station on automatic program test authority
(b) ☒ Commercial station ☐ Noncommercial station
(c) ☐ Directional antenna ☒ Non-directional antenna

SPECIAL OPERATING CONDITIONS MAY PROHIBIT AUTOMATIC PROGRAM TEST AUTHORITY

2. Call Sign: WOHL-FM 3. Frequency or channel: 251C2 Class: C2

4. Community of License:

City <u>Live Oak</u>	State <u>FL</u>
-------------------------	--------------------

Select one that applies and enter the file number(s) on the appropriate line(s). This application:

- (a) ☐ covers a construction permit. Original file number: _____
as modified by: _____
as extended by: _____
as replaced by: _____

- (b) ☒ modifies a license, file number: Upgrade in MM Docket No. 90-546 to
Channel 251C1 - See Exhibit No. 1

6. Is this application being filed pursuant to MM Docket No. 88-375 (Class A Upgrade)? See instructions.

☐ Yes ☒ No

If YES, attach the supplemental Exhibit to this application.

Exhibit No.

IF YOU SELECTED 6(b), "MODIFIES A LICENSE," PROCEED TO ITEM 8.

7. Expiration date of construction permit:

Month	Day	Year
-------	-----	------

THIS APPLICATION MUST BE ON FILE WITH THE COMMISSION BEFORE THE
EXPIRATION DATE OF YOUR CONSTRUCTION PERMIT. SEE INSTRUCTIONS.

Section 1 - GENERAL INFORMATION (Page 2)

3. (a) Has an adverse finding been made or an adverse final action taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law related to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination? ☐ Yes ☒ No

(b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in (a) above? ☐ Yes ☒ No

If the answer to (a) and/or (b) above is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), a statement of the facts upon which the proceeding is or was based or the nature of the offense alleged or committed, and a description of the current status or disposition of the matter.

Exhibit No.

4. For permittees of commercial FM stations only:

Has permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3815(b)? See instructions. ☐ Yes ☐ No ☒ Does Not Apply

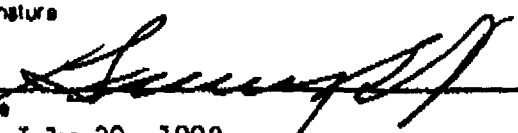
The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See 47 U.S.C. Section 304.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATIONS

5. By checking Yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 882, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b). ☒ Yes ☐ No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant	Signature
Day Communications, Inc.	
Title	Date
President	July 30, 1993

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of this application is in the public interest, in reaching that determination, or for law enforcement purposes. It may be necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's rules. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. SECTION 552(a)(3).

Exhibit No. 1

Day Communications, Inc., the licensee of WQHL-FM, Live Oak, Florida, hereby requests that its Live Oak, Florida Channel 251C1 allotment be downgraded to Channel 251C2. There are no changes to the present Class C2 facility.

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CH 251A, SUBSTITUTING CH 251C3 @ DAWSON, GA
DELETING CH 252A, SUBSTITUTING CH 236A @ CORDELE, GA
DELETING CH 236A, SUBSTITUTING CH 290A @ MONTEZUMA, GA
DAWSON BROADCASTING COMPANY
(John F. Tuck & Phonso Donaldson, Receivers)

The instant engineering statement and related exhibits are submitted in support of the attached petition for rule making. Dawson Broadcasting Company (DBC), by its court appointed receivers, are petitioning the Commission to issue a notice of proposed rule making and order to show cause that will allow the deletion of channel 251A and the subsequent substitution of channel 251C3 for use by WAZE(FM) Dawson, GA.

Channel 251A was substituted for channel 221A at Dawson in the Final Report and Order of MM Docket 90-475. Broadcast Associates (BA), licensee of WESP(FM), Dothan, Alabama, filed a counterproposal that proposed the use of channel 251C3 at Sasser in lieu of the requested channel 299C3. Subsequent action by the Commission on channel 251C1 at Live Oak caused short spacing to the BA counterproposal. However, the short spacing to channel 251C1 at Live Oak was basically a moot point since some party to the Dawson proceeding agreed to accept the

allocation of channel 251A for channel 221A at Dawson.

Recently (August 3, 1993) Day Communications, Inc., licensee of WQHL(FM), Live Oak, Florida, filed a form 302 seeking to downgrade to a class C2 at its present site, thus forfeiting its class C1 allocation. This action eliminated the possible short space between the allocation of channel 251C3 in the Dawson/Sasser area after WFFN(FM), Cordele, Georgia, is re-allocated to channel 236A. WFFN can be assigned to channel 236A when channel 290A is substituted for channel 236A at the CP site of WLML(FM), Montezuma, Georgia.

THE REQUEST

Basically the DBC petition can be technically explained as follows;

- 1). Delete channel 251A at Dawson and substitute channel 251C3 at the coordinates in Exhibit E, Figure 1. (31° 40' 03" NL; 84° 16' 37" WL)
- 2). In order to eliminate short spacing to WFFN(FM), Cordele, Georgia, on first adjacent channel 252A, substitute channel 236A at the WKKN licensed site.
- 3). Channel 236A is currently allocated to Montezuma, Georgia. It presently not in use, however Macon County Broadcasting Company has an extension pending for additional time to construct WLML(FM). DBC proposes allocating channel 290A to Montezuma at the CP site of WLML.

EXHIBITS EXPLAINED

Exhibit E, Figure 1 is an allocation study using the

DBC coordinates as reference. The study depicts that after channel 251C1 at Live Oak is removed from the Commission's Table of Allotments, channel 251C3 will meet the separation requirements as they relate to Live Oak.

Exhibit E, Figure 2 is a computer generated contour chart depicting that an antenna location window exist for the allocation of channel 251C3 at Dawson. This chart is on a 1:500,000 scale.

Exhibit E, Figure 3 is a portion of a Georgia USGS State Topographical Map. The study or reference coordinates proposed in the instant PRM are plotted with the actual city grade (23.90 KM theocratical 70 dBu for maximum class C3 stations) contour drawn in. The city boundaries of Dawson are also shown. Terrain elevations and a 100 meter antenna (HAAT) were considered, therefore, the city boundaries/city contour relationship is not theocratical but empirical. This exhibit clearly demonstrates that the allocation of channel 251C3, at the reference coordinates, provides the required 70 dBu contour service to all of the city of license.

Exhibit E, Figure 4 is an allocation study depicting that channel 236A can be allocated to WKKN, at its licensed site, once channel 290A is substituted for channel 236A at Montezuma.

Exhibit E, Figure 5 is an allocation using the CP site of WLML as reference. This study depicts that channel 290A

can be substituted for channel 236A at the CP site of WLML, Montezuma. In fact, channels 236A and 290A are mutually exclusive at the WLML site since they are 54 channels (10.8 Mhz) apart. This makes the channels an IF mutually exclusive.

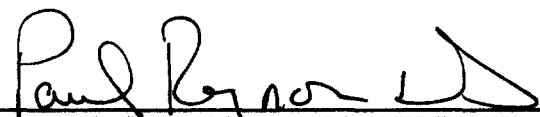
CONCLUSION

The instant engineering statement submitted in support of a petition for rule making demonstrates that channel 251C3 can be substituted for channel 251A at Dawson, Georgia now that WQHL(FM), Live Oak, Florida, has filed a form 302 to downgrade from channel 251C1 to channel 251C2 at its present site. Now the only substitutions needed for this upgrade is the deletion of channel 252A and the substitution of channel 236A at the licensed site of WKKN(FM, Cordele, Georgia. It appears that the licensee of WKKN is agreeable to this substitution and therefore no show cause order would be needed. The only other channel change required is the deletion of channel 236A and the allotment of channel 290A at the CP site of WLML(FM), Montezuma, Georgia. The permittee of WLML presently has a form 307 (extension of time request) pending before the Commission. Therefore, this substitution will not require any interruption of service at Montezuma.

All of the studies included in this statement are in compliance with the Commission's minimum distance separation requirements.

CERTIFICATION

I, Paul Reynolds, hereby certify the following: that I am an independent broadcast consultant; that I hold a Bachelor of Science degree in Communications from the University of Southern Mississippi and have completed work for a Masters Degree in Communications from the University of Alabama; I have been a practicing consultant since 1980, and I am familiar with the Commission's rules and regulations; I have filed numerous petitions and applications in association with Amerimedia, Inc., and my qualifications are known in the industry and at the Commission; I have been retained by the Trustees of Dawson Broadcasting Company to prepare this Engineering Statement in support of a "Petition for Rule Making"; All information in this engineering statement was prepared by me or under my supervision.

Signed 
PAUL REYNOLDS, CONSULTANT

THIS 6th DAY OF SEPTEMBER, 1993

415 NORTH COLLEGE STREET
GREENVILLE, ALABAMA 36037
(205) 382-8048

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

EXHIBIT E
Figure 1

DELETING CH 251A, SUBSTITUTING CH 251C3 @ DAWSON, GA
DELETING CH 252A, SUBSTITUTING CH 236A @ CORDELE, GA
DELETING CH 236A, SUBSTITUTING CH 290A @ MONTEZUMA, GA

DAWSON BROADCASTING COMPANY

(John F. Tuck & Phonso Donaldson, Receivers)

ALLOCATION STUDY

[DEPICTING THAT CH 251C3 CAN BE SUBSTITUTED FOR CH 251A @ DAWSON]
(AFTER VOLUNTARY DOWNGRADE OF WQHL, LIVE OAK, FL & SUBSTITUTION OF CH 236A FOR
CH 252A AT CORDELE, GA)

31 40 03 N. 84 16 37 W.			Class C3 Current rules spacings Channel 251 - 98.1 MHz			Search Date 08-31-93		
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
COMMUNITY OF DAWSON			GA	303.9	19.76		*	
31° 46' 00"								
84° 27' 00"								
AD251	251A	Dawson	GA	290.9	20.97	142.0	-121.03 *	
Of No Concern								
Allocation Coordinates of Ch 251A								
MM Docket 90-475								
WKKN	252A	Cordele	GA	56.3	57.85	89.0	-31.15 *	
Of Concern								
Substitution of Ch 236A Proposed								
in Instant PRM								
ALOPEN	251C1	Live Oak	FL	147.3	204.13	211.0	-6.87 *	
Of No Concern								
Form 302 to Downgrade								
Public Notice 8/13/93								
File No. BMLH - 930803KB								
WISKFM	254C3	Americus	GA	2.5	45.89	43.0	2.89 *	
WDMT	250A	Eufaula	AL	288.6	92.97	89.0	3.97 *	
WVY.C	250C3	Fort Valley	GA	26.1	111.46	99.0	12.46	
WAGH.C	252A	Fort Mitchell	AL	316.5	106.37	89.0	17.37	
WQHLFM	251C2	Live Oak	FL	140.7	197.75	177.0	20.75	
WRLDFM	251A	Valley	AL	327.3	165.87	142.0	23.87	
AD251	251C3	Hogansville	GA	335.4	182.75	153.0	29.75	
WWSFFM	251C1	Andalusia	AL	252.0	244.36	211.0	33.36	
WCAA	249A	Ocilla	GA	99.9	90.71	42.0	48.71	

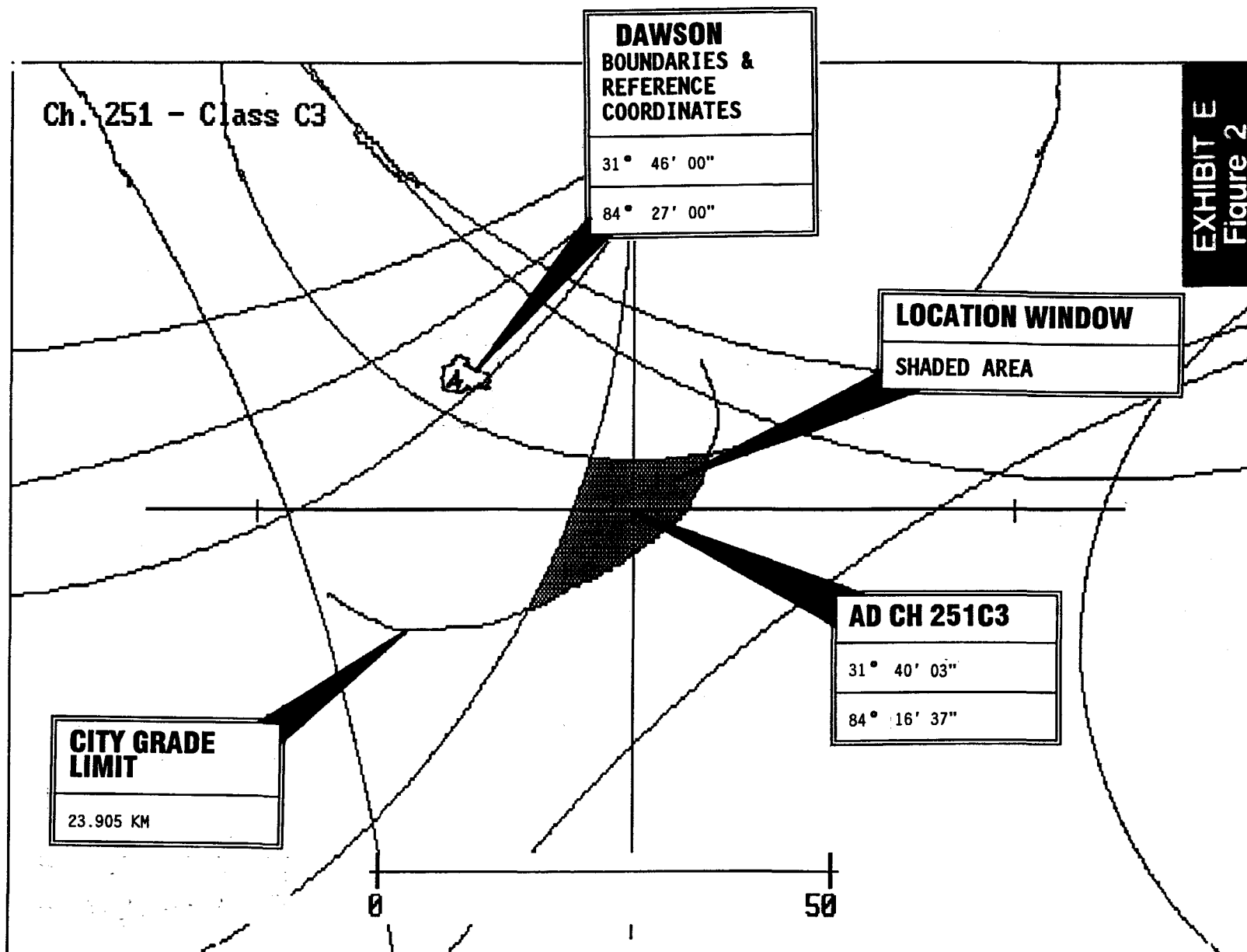


EXHIBIT E
Figure 2

Scale 1:500,000
STEWART WEBSTER

**DAWSON
BOUNDARIES &
REFERENCE
COORDINATES**

31° 46' 00"
84° 27' 00"

AD CH 251C3

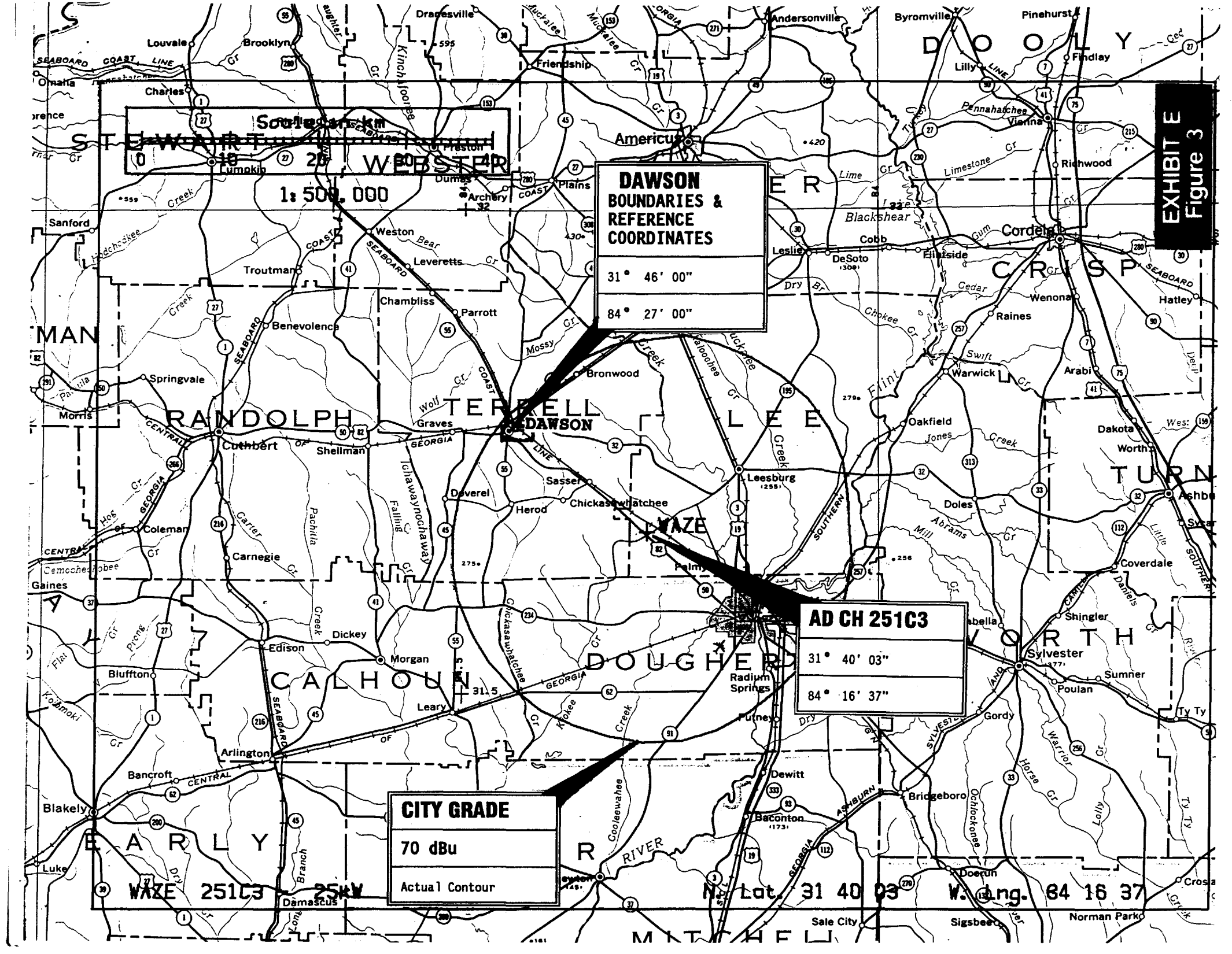
31° 40' 03"
84° 16' 37"

CITY GRADE

70 dBu
Actual Contour

WAZE 251C3 25kW

N. Lat. 31 40 03 W. Long. 84 16 37



ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CH 251A, SUBSTITUTING CH 251C3 @ DAWSON, GA
DELETING CH 252A, SUBSTITUTING CH 236A @ CORDELE, GA
DELETING CH 236A, SUBSTITUTING CH 290A @ MONTEZUMA, GA

DAWSON BROADCASTING COMPANY

(John F. Tuck & Phonso Donalson, Receivers)

ALLOCATION STUDY

[DEPICTING THAT CH 236A CAN BE SUBSTITUTED FOR CH 252A @ LICENSED SITE OF WKNK]
(AFTER CH 290A IS SUBSTITUTED FOR CH 236A AT CP SITE OF WLML, MONTEZUMA, GA]

31 57 26 N. Class A Search Date
83 46 08 W. Current rules spacings 08-31-93
Channel 236 - 95.1 MHz

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
------	-----	------	-------	-------	-------	-------	--------

AD236	236A	Cordele	GA	0.0	0.00	115.0	-115.00 *
-------	------	---------	----	-----	------	-------	-----------

Of No Concern

Substitution Proposed in

MM Docket 90-475

WLML.C	236A	Montezuma	GA	326.5	45.32	115.0	-69.68 *
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Of Concern

Substitution of Ch 290A Proposed

WJYF.C	237C3	Nashville	GA	156.3	95.13	89.0	6.13 *
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WDECFM	234C3	Americus	GA	262.7	51.40	42.0	9.40 *
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WYSC	237A	Mc Rae	GA	82.6	86.07	72.0	14.07
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WFFM	289A	Ashburn	GA	158.4	32.11	10.0	22.11
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WJYF	237A	Nashville	GA	156.3	95.13	72.0	23.13
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WTNT	235C1	Tallahassee	FL	197.1	159.94	133.0	26.94
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WBYZ	233C	Baxley	GA	98.6	126.16	95.0	31.16
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AD290	290A	Montezuma	GA	327.4	45.05	10.0	35.05
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DE237	237A	Thomaston	GA	328.7	117.68	72.0	45.68
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WTGAFM	237A	Thomaston	GA	328.7	117.68	72.0	45.68
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WAPEFM	236C	Jacksonville	FL	131.8	271.93	226.0	45.93
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WPCH	235C	Atlanta	GA	345.4	212.05	165.0	47.05
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EXHIBIT E
Figure 4

ENGINEERING STATEMENT

IN SUPPORT A

PETITION FOR RULE MAKING

DELETING CH 251A, SUBSTITUTING CH 251C3 @ DAWSON, GA
DELETING CH 252A, SUBSTITUTING CH 236A @ CORDELE, GA
DELETING CH 236A, SUBSTITUTING CH 290A @ MONTEZUMA, GA

DAWSON BROADCASTING COMPANY

(John F. Tuck & Phonso Donaldson, Receivers)

ALLOCATION STUDY

[DEPICTING THAT CH 290A CAN BE SUBSTITUTED FOR CH 236A @ CP SITE OF WLML]
(NO ADDITIONAL SUBSTITUTIONS REQUIRED)

32 17 53 N. 84 02 02 W.			Class A Current rules spacings Channel 290 -105.9 MHz				Search Date 09-02-93	
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin	
AD290	290A	Montezuma	GA	78.1	0.75	115.0	-114.25 *	
Of No Concern Proposed Substitution in MM Docket 90-475								
WLML.C	236A	Montezuma	GA	0.0	0.00	10.0	-10.00 *	
Of No Concern IF Channel to Proposed Substitution								
WQBZ	292C2	Fort Valley	GA	27.8	57.75	55.0	2.75 *	
WFFM	289A	Ashburn	GA	151.4	77.03	72.0	5.03 *	
WDENFM	287C1	Macon	GA	35.2	81.26	75.0	6.26 *	
WSTHFM	291C1	Alexander City	AL	290.8	144.09	133.0	11.09	
WKMK.C	291A	Sylvester	GA	173.6	88.58	72.0	16.58	
AD290	290C3	Lakeland	GA	147.1	166.06	142.0	24.06	
AD236	236A	Cordele	GA	146.5	45.32	10.0	35.32	
WZHT	289C	Troy	AL	259.9	204.03	165.0	39.03	
WHFE.C	290A	Lakeland	GA	151.0	157.26	115.0	42.26	
DE290	290A	Lakeland	GA	149.0	157.29	115.0	42.29	

EXHIBIT E
Figure 5

CERTIFICATE OF SERVICE

I, C. Truitt Martin, Jr., Attorney for John F. Tuck and Phonso Donaldson, Court Appointed Receivers for Dawson Broadcasting Company, do hereby certify that copies of the foregoing document were mailed by first class U.S. Mail, postage prepaid, on September 8th, 1993, to the following:

Jim Jennings, President
RADIO CORDELE, INC.
WKKN(FM) Radio
910 20th Avenue East
Cordele, GA 31015

Macon County Broadcasters, Inc.
WLML(FM) Radio
P.O. Box 511
Montezuma, Georgia 31063


C. Truitt Martin, Jr., Esq.